

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100 BOSTON, MASSACHUSETTS 02109-3912

Clean Air Act Inspection Report

Drafted: January 23, 2023 **Finalized:** January 27, 2023

EPA Inspector: Abdi T. Mohamoud, Environmental Engineer, Air Compliance Section /ATM/

Hannah Patel, Environmental Scientist, Air Compliance Section /HHP/

EPA Reviewer: Darren Fortescue, Senior Enforcement Coordinator, Air Compliance Section /DEF/

Date of Inspection: January 10, 2023

Facility Name: Dead Jeep

ICISAir ID#: RI0000004400791020

Facility Location: 120 Ralco Way, Cumberland, RI 02864

Mailing Address: As above

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Inspection Attendees:

Name	Title	Organization
Abdi T. Mohamoud	Clean Air Act Inspector	US EPA
Hannah Patel	Clean Air Act Inspector	US EPA
Raymond Moulton	Dead Jeep	Owner

Process Description:

Dead Jeep is a used Jeep parts distributor located in Cumberland, Rhode Island, US.

Number of Employees and Working Hours:

Dead Jeep employs approximately 12 people, and the hours of operation are Monday to Friday from 8:00 am to 5:00 pm.

Potentially Applicable Clean Air Act Requirements:

40 CFR Part 82, Subpart B - Servicing of Motor Vehicle Air Conditioners

Previous Enforcement Actions:

Based on a review of the EPA's Enforcement and Compliance History Online database ("ECHO"), there have been no formal or informal enforcement actions against this facility in the last 5 years.

Opening Conference:

On January 10, 2023, at 10:00 am, EPA inspectors, Abdi Mohamoud and Hannah Patel, arrived at the facility, located at 120 Ralco Way, Cumberland, Rhode Island, and met with Raymond Moulton. Mr. Mohamoud and Ms. Patel presented their credentials to Mr. Moulton. Mr. Mohamoud explained the purpose of the inspection was to evaluate Dead Jeep's compliance with any applicable Clean Air Act regulations, specifically the federal standard that establishes requirements for the Servicing of Motor Vehicle Air Conditioners containing ozone-depleting refrigerant.

Mr. Mohamoud informed Mr. Moulton that EPA had received a complaint about Dead Jeep's handling of refrigerant from used automobiles. Mr. Moulton immediately denied any wrongdoing and said his neighbor is making complaints inappropriately about his company. Mr. Mohamoud said the complaint originated from one of Dead Jeep's employees who had indicated that the company was releasing refrigerant from used automobiles intentionally. Mr. Moulton initially said that he was not releasing refrigerant, but later admitted that sometimes refrigeration lines are cut releasing refrigerant.

Mr. Mohamoud asked what is the procedure the company follows when accepting vehicles with refrigerants. Mr. Moulton said that Dead Jeep does not typically accept vehicles that still contain refrigerants. Mr. Mohamoud asked if Dead Jeep has a recovery/recycling machine and Mr. Moulton said not at the moment but he used to, and his friend borrowed it.

Facility Tour:

Mr. Mohamoud and Ms. Patel were given a walk-through of the yard and saw many old Jeeps waiting to be dismantled. Ms. Patel took several photographs of the Jeeps in the yard (all photographs are stored in the inspection file). Mr. Mohamoud noted that several of the jeeps retained most of the engine components.

Closing Conference:

Mr. Mohamoud reiterated the purpose of the inspection, thanked Mr. Moulton for his time and assistance, and the EPA inspectors left the site.